

JANET LEE HOFFMAN, OSB No. 781145
E-mail: janet@jhoffman.com
KATHERINE MARCHANT, OSB NO. 161147
E-mail: katie@jhoffman.com
Janet Hoffman & Associates LLC
1000 SW Broadway, Ste. 1500
Portland, OR 97205
Telephone: (503) 222-1125

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANNE HANKINS,

Defendant.

CASE NO. 6:22-cr-00317-MC

**DECLARATION OF COUNSEL IN
SUPPORT OF DEFENDANT ANNE
HANKINS' MOTION TO CONTINUE
RESTITUTION HEARING**

I, Janet Hoffman, for my declaration pursuant to 28 U.S.C. § 1746, state:

1. I represent Anne Hankins and am lead counsel in the above-captioned case.
2. I make this declaration in support of Ms. Hankins' Motion to Continue Restitution Hearing.
3. I have knowledge of the matters in this declaration based on (i) my own personal information; (ii) what I have learned reviewing documents; and (iii) what has been related to me.
4. Ms. Hankins' restitution hearing is currently set for May 30, 2023, at 11:00 a.m.
5. My Husband and I spent the past 5 weeks traveling in Indonesia and New Zealand. We returned home to Oregon on the 17th of May. Remotely, I worked with my office

preparing for Ms. Hankins' restitution hearing. However, the final pleadings, client conferences and strategic decisions were postponed until my arrival home, where I could meet in person with Ms. Hankins and co-counsel and review supporting materials.

6. On May 17, 2023, the day we arrived in Portland, my husband tested positive for COVID-19.
7. On May 17, I worked at my office, where I was preparing for the upcoming restitution hearing and reviewing drafts of our pleading, when we received notification from the Court stating there would need to be a continuance of the restitution hearing. At that point, I put my preparation aside and turned my attention to other more imminent matters.
8. On May 18, 2023, I became very symptomatic for COVID-19, and I tested positive. At that point, I canceled all of my activities both because I could not fully concentrate and my desire not to expose anyone I came in contact with.
9. I have the usual COVID-19 symptoms, including loss of smell, fatigue, coughing and difficulty with prolonged concentration. Moreover, I am still COVID positive. As a result, I am currently unable to adequately prepare for the upcoming restitution hearing.
10. Although I am available for zoom calls and regular phone calls, my concentration is poor and, most importantly, I am unable to meet with my client in person, which is necessary for a reasonable preparation. In order to refute the Government's restitution claim, the defense intends to present a number of financial and accounting records to show that the Government's claim fails to account for the significant value that Ms. Hankins has already returned to the victims, which should be offset from the \$1,500,000 requested. I need to be able to review these documents, as well as other relevant evidence, with Ms. Hankins.

DATED this 22nd day of May 2023

Respectfully submitted,

s/Janet Hoffman

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Email: katie@jhoffman.com

Attorneys for Defendant Anne Hankins